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December 9, 2002

RE: Contract No. 68-W6-0036
Responses to EPA comments on the Draft Work Plan for the Diamond Head Oil Superfund Site
Kearny, New Jersey
Work Assignment No. 112-RICO-KK

Dear Ms. Diaz-Cotto:

The purpose of this letter is to respond to the U.S. Environmental Protection Agency (EPA) Region II's second set of comments on the draft Work Plan dated June 25, 2002 for the Diamond Head Oil Superfund Site in Kearny, New Jersey. EPA Region II had previously provided comments on the Draft Work Plan in a letter received by CH2M HILL on October 4, 2002. CH2M HILL had responded to these comments on October 18, 2002. EPA Region II provided additional comments on several of the original issues in a letter received by CH2M HILL on November 22, 2002. In the interim, these issues were discussed and resolved during two conference calls between EPA and CH2M HILL on November 20 and December 3, 2002. This letter describes the resolutions reached during these calls.

EPA Comment 4 - Page 2-28. As part of the deep-well drilling task, gamma-ray logs should be collected from all the borings. Logs from some selected shallow borings could also be collected.

Response: As requested, gamma-ray logging of the four deep borings will be performed.

EPA Comment 5 - Page 2-30. Please justify the assumption of 20-foot screens for the deeper wells.

Response: As requested, the appropriate screen length (10 feet or 20 feet) will be determined at each well location based on the observed subsurface materials at the location.

Comment 8 - Page 2-51. The time for importing electronic files for the Phase 1 data is estimated at 1 LOE per sample. In the same lines, the time for entering sample results for the historical data is estimated at 2.5 LOE per sample. These seem to be high estimates for these tasks.

Response: It was agreed that CH2M HILL would reduce the LOE for importing the data into EQUIS to 0.75 LOE per sample for the new data and 2.25 LOE per sample for the existing data. This reduction was based on the expectation that the CLP would begin shortly to provide new EDDs, which could be imported more easily into EQUIS than the previous EDDs. The CLP would begin generating these new EDDs prior to the start of the sampling at the Diamond Head site. EPA would also be providing us with an electronic data checker to facilitate the EDD import process. As the use of EQUIS is relatively new and there is not a long track record of data management costs using EQUIS, it was agreed that CH2M HILL would track the LOE

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expanded for the various data management activities included under the DE task in order to begin the development of LOE reference points for data management.

EPA Comment 10 - Page 2-54. The Technical Memo should include a section about the site conceptual model, which should begin to synthesize the information we have about the contamination, the hydrogeologic framework, and the possible transport of water and contaminants through the site.

Response: The conceptual site model will be added to the scope of the Technical Memo. While EPA expects that some revisions to this model may be needed based on data collected during the Phase 2 investigation, the availability of this model will be reflected when developing the LOE for the RI Report preparation task at the end of the Phase 2 investigation.

Comment 11 - Third bullet. The discussion of the Region IX PRGs should recognize that the PRGs were developed in 2000 and that updates to the database may be necessary to complete the screening criteria. This is not reflected in the labor estimate (also on page 2-57 and Report 4).

Response: No LOE have been added to the Work Plan. CH2M HILL will contact EPA if any of the PRGs need to be recalculated.

Comment 11 - Seventh bullet. The analysis of fugitive dust should identify which SSL guidance document will be used.

Response: The document will be referenced correctly in the Work Plan.

Comment 17 - Table D It is unclear if TCL organics include all TCL-VOCs, SVOCs, PCBs, Dioxin/Pesticides or just selected analyses.

Response: Dioxin and furan analyses may be included in future investigation phases.

Comment 17 - Table D Page 1 of 3. It is suggested that soil samples will be selected for lab analysis based on PID readings and LNAPLs. However, the screening criteria that will be used to select these samples is missing. In addition, should other field screening techniques also be included?

Response: Text will be added to the Work Plan to explain the screening procedures and rationale for selecting samples for analysis.

Comment 17 - Table D Page 2 of 3. It is not clear if the soil samples will be collected and analyzed from the soil borings that will be drilled for monitoring well installation.

Response: Text will be added to the Work Plan clarifying the soil sampling methodology.

EPA Comment 18 - Table E. The number of QA/QC samples proposed appear to approximate 30% of the samples. Please explain the rationale behind this percentage, which is higher than is typically seen in Remedial Investigations.

Response: The number of QA/QC samples was revised to 20%.

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EPA Comment 19 - Table F. Explain the rationale behind analyzing only 3 samples for geotechnical parameters.

Response: As instructed, the number of samples will be maintained at 3 for this phase of the investigation.

Please call if you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alpheus Sloan, III', with a stylized flourish at the end.

Alpheus Sloan, III
Program Manager
CH2M HILL

DCN: 02-4666

cc: Tom Reilly, Project Officer USEPA Region 6
Juliana Hess, Project Manager CH2M HILL